Plan Wording Style Guide

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Although this style guide contains references to the 2008 Planning Rule, the guidance presented is not intended to be specific to any planning rule unless explicitly stated for that portion of the document.

Table of Contents

PLAN WORDING STYLE GUIDE	1
TABLE OF CONTENTS	2
OVERVIEW	3
Guidance Applicable to All Publications	3
PLAN COMPONENTS	3
Plan Components do not include explanatory narrative Desired Conditions Objectives Suitable Uses Special Areas Guidelines Standards	
EXAMPLES OF STANDARDS	
EXAMPLES OF PUBLIC USE PROHIBITIONS (CLOSURE ORDERS)	
WHAT IS THE DIFFERENCE BETWEEN A GUIDELINE AND A STANDAR	
OTHER SOURCES OF DIRECTION	12
OTHER INFORMATION	
Management Approaches Other Referenced Information What to include in the "Possible Actions" appendix Plan Consistency Glossary	14 14 15
References and Citations	
WORDS FOR 2008 PLANNING RULE PLANS ERROR! BOOKMARK NOT	Γ DEFINED.
WHAT NOT TO INCLUDE IN THE PLAN	17
Direction regarding project level analysis Inventory and assessment tasks Direction to develop tactical management plans Existing policy or direction	17 17

OVERVIEW

This land management plan wording style guide is meant to aid planning efforts under the National Forest System Land Management Planning regulations (36 CFR 219)(also referred to as 2008 planning rule). Use it in conjunction with the National Forest Management Act (NFMA), planning directives (Forest Service Manual (FSM) 1920 and Forest Service Handbook (FSH) 1909.12), and other national or regional planning guidance (such as the plan model and other technical guides) posted on the Technical Information for Planning Systems (TIPS) website at www.fs.fed.us/TIPS.

As a working document, this land management plan wording style guide will be updated occasionally as lessons are learned and experience calls for adjustments. Please check www.fs.fed.us/TIPS regularly to see updates to this and other planning tools.

This style guide's primary focus is writing land management plans (also referred to as plans) that may be adopted with a categorical exclusion (CE). Plans may be approved with a CE from further analysis, documentation in an environmental impact statement (EIS), or documentation in an environmental assessment (EA). This document also provides for plans that include new final agency actions, with immediate environmental impact and thus an EA or EIS would be required for such a plan approval.

Guidance Applicable to All Publications

The United States Government Printing Office (GPO) Style Guide is the standard for all government publications (http://www.gpoaccess.gov/stylemanual/index.html). The Forest Service specifies the requirements for writing, editing, literature citations, and nondiscrimination statements in FSH 1609.11, Chapter 10, Requirements Applicable to All Publications.

Write so your audience can understand the first time they read it (see http://www.plainlanguage.gov/). The Ecosystem Management Coordination's (EMC's) Publishing Arts has published a style guide. It is written as a guide for clients of EMC Publishing Arts, but the style guide may be a useful reference. It has guidance on style and usage. The pathname is: http://www.fs.fed.us/emc/pa/includes/StyleGuide_102407.pdf.

PLAN COMPONENTS

The 2008 planning rule places a very specific meaning on the term "plan components." A plan should contain the following five plan components: desired conditions, objectives, suitable uses, special areas, and guidelines. A plan may optionally contain a sixth plan component – standards. Each of these components has a specific definition and purpose in a plan and must be clearly identified and succinctly described following the direction/guidance found in the planning rule (36 CFR subpart 219), planning manual (FSM 1920), planning handbook (FSH 1909.12), and this style guide document.

Plan Components do not include explanatory narrative

Plan components should <u>not</u> include explanatory narrative. Plan components are: desired conditions, objectives, suitability of areas, special areas, guidelines, and standards (where appropriate). Each plan component must be clearly identified within a plan. If you deem additional explanatory narrative is necessary, it may be included elsewhere in the plan or in the plan set of documents. Do not label explanatory narrative as a plan component. Some planners use captions to label plan components distinctly. Others set the format of the paragraphs containing plan components with borders to label them distinctly.

Desired Conditions

(See interim directive id_1909.12-2008-2, FSH 1909.12, section 11.11.)

A desired condition (DC) is the plan component that states the "vision" for the unit, in whole or in part, describing the social, economic, and ecological attributes toward which management of the plan area is to be directed.

A desired condition

- 1. Must focus on conditions, not agency actions.
- 2. Should be written clearly and concisely (see http://www.plainlanguage.gov/);
- 3. Must <u>not</u> be written in compulsory wording (wording needs to be an aspirational outcome—must not use the words—must, should, or shall). Throughout this document, the word 'compulsory' denotes wording that would force the Agency to initiate action. For example, a desired condition requiring removal of developments from riparian areas would be considered compulsory. A desired condition with a mandatory helping verb would imply a final decision requiring action.

For details on the form and content of the desired condition plan component, see the Desired Condition Technical Guide (TG-08) on the TIPs website (www.fs.fed.us/TIPS).

Objectives

(See interim directive id 1909.12-2008-2, FSH 1909.12, section 11.12.)

Objectives are projections of measurable and time-specific outcomes or accomplishments that if achieved would contribute to maintaining or reaching DCs during the plan period. Objectives are not requirements, however. Each objective must relate to a DC.

Objectives are: potential outcomes, results, or things to accomplish. Objectives must not imply a program of work or a list of projects. We definitely must avoid the concept of a program of work or list of projects, as it could give the wrong idea about the nature of a plan. An objective should not appear to be an order to do something. Objectives may be expressed as a range of potential outcomes. Objectives are realistic stops along the way used to gauge our progress. So, objectives are stated as accomplishments with a timeframe:

Objectives-

- 1. May apply to all or part of the plan area;
- 2. Must <u>not</u> be written in compulsory language;
- 3. Should be written clearly and concisely; and

Timeframes:

Each objective must have a timeframe:

- 1. "by XXX date"
- 2. "annually," or "each year"
- 3. "within X years of plan approval" (Note: The starting point must be clear.)
- 4. "on average," XXX "annually."

Below we show several ways to write objectives, we recommend you pick a method and use it regularly. One way to write objectives is to finish the sentence. "The objective is the...."

For example:

- 1. precommercial thinning of XX to XX acres by 2010,
- 2. prescribed burning of X acres annually, or
- 3. harvesting of 1 mmbf merchantable timber each year.

Another way to write objectives is to state:

- 1. An increase of, or to increase XXX¹
- 2. A decrease of, to decrease XXX¹
- 3. The creation of, or to create XXX²
- 4. The establishment of, or to establish XXX²
- 5. The removal of, or to remove XXX^2
- 6. The addition of, or to add XXX^2
- 7. The maintenance of, or to maintain XXX^2
- 8. The eradication of, or to eradicate XXX²
- 9. The restoration of, or to restore XXX^2
- 10. The development of, or to develop XXX^2
- 11. The closure of, or to close XXX²

For example:

¹ finite number – or specific percentage of something—if the reader can tell the initial starting point

² finite number – or specific percentage of something

- 1. To increase the percentage of early successional oak-hickory forest habitat from the existing 1 percent of National Forest System (NFS) lands to 3 to 5 percent of NFS lands in oak hickory, by 2020.
- 2. Over the planning period, to maintain 2,200 acres identified as existing longleaf pine in 2006 as longleaf pine woodlands.
- 3. To restore five to thirteen subpopulations of Schweinitz's sunflower to appropriate sites by 2020.
- 4. By 2020, to restore 1,500 linear feet of unstable stream channel.
- 5. The development of a heritage resources interpretive trail within five years of plan approval.
- 6. The eradication of at least of 400 acres of tamarisk annually.
- 7. The closure of one to two miles of unauthorized trails annually throughout the plan period, considering the following priorities:
 - 1. Those impacting archeological sites;
 - 2. Those impacting rare plant communities; and
 - 3. Those impacting streamside forests.

Another way to write objectives is to follow the pattern of the following examples:

At the end of the first decade of the Plan:

- Approximately 600 acres of the 3,600 total acres of southern loess bluff forest are in the 0- to 10-year age class (from conversion).
- The estimated 61,000 acres of this ecosystem have received a fire return interval of 1-6 years, with 15-25 percent of the burns conducted in the growing season.
- At least two new driving tours are developed to highlight unique forest features, scenic routes, heritage sites, or seasonal natural interests.
- At least 1,800 previously infested acres are free of invasive species.

More explicit examples:

Example 1.

1.a. An **unacceptable** objective statement

During the next 15 years, a watershed-habitat rehabilitation program would be developed or maintained to help with the maintenance and recovery of aquatic systems. Practices would stress reaching appropriate riparian and upland vegetation conditions eliminating human-made fish passage barriers, ensuring proper drainage systems for roads, and restoring native vegetation and natural channel geomorphology.

1.b. Acceptable objective statements

- 1. Removing of fish passage barriers from at least 25 more miles of streams within 15 years of plan approval
- 2. Establishing of proper drainage systems on at least 30 more miles of road within the first five years of the plan.
- 3. Restoring of native vegetation and natural channel geomorphology on 5 miles of stream by 2020.

What is the difference between the acceptable and unacceptable examples? The acceptable example has specific times and measurable terms. The acceptable example does not direct the means of accomplishing the objectives.

Example 2.

2.a. An **unacceptable** objective statement

Dispersed recreation sites may be closed, rehabilitated, or otherwise mitigated if the site is within 100 feet of surrounding lakes and streams, unless otherwise designated.

2.b. An acceptable objective statement

Closing and rehabilitating of at least eight of the undesignated dispersed sites found to be within 100 feet of surrounding lakes and streams within 5 years of plan signing, unless they otherwise are identified as a designated dispersed site.

What is the difference between the acceptable and unacceptable examples? The acceptable example has specific times and measurable terms.

Suitable Uses

(See interim directive id_1909.12-2008-2, FSH 1909.12, section 11.14.)

Suitable Uses-

- 1. May apply to all or part of the plan area;
- 2. Must <u>not</u> use any of the following words to describe general suitability: not suitable (may use "*generally* not suitable"), inconsistent, restricted, limited, unacceptable, constrained, not allowed, or no;

Examples:

- 1. Areas along and within 100 feet of designated motorized travel routes are generally suitable for motorized dispersed camping (that is, camping outside designated campgrounds).
- 2. Semi-primitive non-motorized areas are generally suitable for timber harvest (including salvage), for multiple-use purposes.

- 3. Semi-primitive non-motorized areas are also generally suitable for commercial harvest of non-timber forest products.
- 4. Areas along, and within 100 feet of riparian areas are generally not suitable for motorized dispersed camping (that is, camping outside designated campgrounds).
- 5. Areas identified as "semi-primitive non-motorized" are generally not suitable for motorized recreation.³

Example of Suitability

Table x-x. Sample General Suitability and Generally Not Suitability in Identified Special Areas

Identified	Broad Use Categories			
Special Areas	Livestock	Summer Motor	Over-Snow	Utility
	Grazing	Vehicle Use	Vehicles	Corridors
Bent Canyon Bluffs	generally suitable	generally not suitable	generally suitable	generally suitable
Campo RNA	generally not	generally	generally	generally not
	suitable	suitable	suitable	suitable

³ Of course, "not suitable" identifications have no effect on non-Agency (third) parties. Uses of National Forest System land for which a special use authorization is not usually required is only controlled by enforcing a closure order under Title 36, Code of Federal Regulations, Part 261—Prohibitions.

Special Areas

(See interim directive id_1909.12-2008-2, FSH 1909.12, section 11.15.)

The intent behind including special areas as a component in plans is not to develop new categories, but rather to assure that plans recognize existing categories Congress, the Department, or the Agency have established.

Special Areas

- 1. Must <u>not</u> include compulsory language.
- 2. Should include a brief description of each area.
- 3. Should include a map showing the location; in any event, the special area must be precisely defined.

Guidelines

(See interim directive id 1909.12-2008-2, FSH 1909.12, section 11.13.)

Guidelines-

- 1. May apply to all or part of the plan area
- 2. Should describe the technical specifications to design projects and activities
- 3. Guidelines should not be written in terms of a mandatory command or prohibition, but in terms of project design criteria that "should" or "should not" be employed. Guidelines must use words like "should," "consider," "generally," or similar language so as <u>not</u> to "require," "commit," "compel," and so on.
 - Incorrect guideline: "Avoid road construction and re-routes on landslide-prone soils." (written as a standard)
 - Suggested guideline: "Road construction and re-routes should be avoided on landslide-prone soils." (the inclusion of "should" puts the statement in the form of a guideline)
- 4. May be organized in different ways, including:
- By specific types of management activities, projects, or uses.
- By specific geographic, management, or other defined area.
- By specific resources.

Message points to determine whether to include a guideline

1. Assuming that I have a DC and objective(s) to help me achieve that DC, do I care **how** I achieve that DC? If I do care, then perhaps I have the basis for writing a guideline for the technical specifications that would help guide how I achieve the DC. If I do not care, why am I trying to write a guideline?

2. What gets to define guideline verbs, such as "minimize" or other nonspecific direction? If the answer is the project, then what value does the plan guideline provide to the project/activity design and future decisionmaking?

Examples

- 1. Mowing, mechanical treatments, and prescribed burning of grasslands should not take place between April 15 to July 15, to protect ground-nesting birds, their nests, and young broods.
- 2. To meet scenery management desired conditions, burial of telephone lines and electrical utility lines of 33 kilovolts or less (including new lines and the replacement of existing lines in existing corridors) should be required for permit issuance or re-issuance unless one or more of the following applies.
 - Burial is not feasible due to geologic hazard or unfavorable geologic conditions
 - Greater long-term site disturbance would result if the lines were buried
- 3. Construction or reconstruction of livestock fencing should ensure that the bottom wire is smooth and 18 inches above the ground and the top wire is no higher than 42 inches above the ground to allow for antelope passage.
- 4. Disturbances, such as road construction, off-road vehicle use, energy development, and reclamation, should not take place within 0.25 miles of active nests of mountain plover (Charadrius montanus) and long-billed curlew (Numenius americanus) from April 10 to July 10.
- 5. Seed mixes used for restoration projects in the shortgrass prairie should include winterfat (Ceratoides lanata) or fourwing saltbush (Atriplex canescens), or both, on appropriate soil types, to improve winter foraging habitat for pronghorn (Antilocapra americana).
- 6. Mechanized ground disturbing equipment should stay more than 30 feet away from intermittent streams. Refer to State Division of Forest Resources Forestry Best Management Practices Manual for more information.
- 7. When restoring shortleaf pine, trees should be planted on a wide spacing (fewer than 350 trees each acre) to allow room for hardwoods to develop as dominant or co-dominant trees.

Standards

(See interim directive id_1909.12-2008-2, FSH 1909.12, section 11.16.)

Standards-.

- 1. May apply to all or part of the plan area;
- 2. May be organized in different ways, including:
 - By specific types of management activities, tools, projects, or uses
 - By specific geographic, management, or other defined area
 - By specific desired condition.
- 3. Are not project or activity decisions, public use prohibitions, or designations of roads, trails, and areas for motor vehicle use under 36 CFR 212.50

Examples of Standards

Standards guide agency action. Examples of standards include the following—.

- 1. Do not authorize timber harvests in management area 4.
- 2. Do not approve the applications for wind, solar, and hydrological power facilities in management area 4.
- 3. When authorizing timber harvest, do not allow timber felling or heavy equipment within 100 feet of the banks of perennial streams.
- 4. When constructing fencing in the Black Mesa Geographic Area, 18" smooth wire construction must be used for pronghorn.
- 5. Prohibit mountain bicycles in management area 4.
- 6. Require that food be stored in bear-proof containers in XX Wilderness.
- 7. Prohibit camping within 100 feet of ponds, lakes, trails, or streams except in designated sites.
- 8. Restrict horses and pack stock to those portions of the trail system specifically designated for their use. Prohibit off trail riding.
- 9. Limit group size to no more than 10 people.

Examples of public use prohibitions (closure orders).

Existing closure orders may be included in the plan as supplementary information. Closure orders are not standards. Closure order examples include—

- 1. Use of bicycles is prohibited in management area 4.
- 2. Use of wheeled vehicles including carts, wagons and bicycles, or motorized travel is prohibited.
- 3. Food" includes all food and drinks, regardless of packaging, along with trash, toiletries, and other scented items. These items **must** be stored in either an approved bear-resistant food canister or food locker.

- 4. Camping within 100 feet of ponds, Mirror Lake, trails, or streams is allowed only in designated sites.
- 5. Horse riders (age 17 years and older) are required to have a permit and stay on designated trails.
- 6. Group size is limited to 10 persons or less.

WHAT IS THE DIFFERENCE BETWEEN A GUIDELINE AND A STANDARD?

The difference between guidelines and standards is manifested in how the NFMA's consistency requirement is met with respect to each.

A project or activity can be consistent with a guideline in one of two ways: (1) the project or activity design is in accord with the explicit provisions of the guideline, or (2) the project or activity design varies from the explicit provisions of the guidelines but is as effective in meeting the purpose of the guideline to maintain or contribute to the attainment of relevant desired conditions and objectives.

A standard is an absolute requirement to be met in the design of projects and activities. A project or activity is consistent with a standard when its design is in accord with the explicit provisions of the standard; variance from a standard in any way is not allowed.

In sum, a project or activity may meet the spirit, if not the letter, of a guideline, but must meet the letter of a standard.

OTHER SOURCES OF DIRECTION

If the responsible official decides the revised plan should include provisions that had been in the prior plan, the responsible official should identify those plan provisions and place the plan provisions in an appropriate part of the plan or reference it if it is to remain in a different document. We provide examples of how to reference a different document below.

If there is a lot of *other* direction (such as insect and disease procedures, conservation agreements, state air quality agreements, and so on), it is recommended that the other direction be consolidated in the plan set of documents, an appendix of the plan, or on the Web rather than dispersed among plan components. In any event, the force and effect of such guidance, if any, must be clear.

Example A

Other Sources of Direction to be considered for Projects and Activities

1992 Oil and Gas Decision

At the time of plan approval, the most current direction for all oil and gas operations that discuss facility design (such as roads and well sites) and potential impacts to resources comes from the record of decision (ROD) for the 1992 Oil and Gas EIS for the Pike and San Isabel National Forests and Cimarron and Comanche National Grasslands (USDA FS 1992).

Example B

Retained Plan Provisions Referenced in Separate Document⁴

The following previous plan provisions remain in place. Subsequent projects and activities must be consistent with them.

Record of decision for the Plan Amendment for Grizzly Bear Habitat Conservation for the Greater Yellowstone Area National Forests.

The plan includes by reference the direction for managing secure grizzly habitat from the April 18, 2006, ROD for the Plan Amendment for Grizzly Bear Habitat Conservation for the Greater Yellowstone Area National Forests. See

http://www.fs.fed.us/r1/wildlife/igbc/Subcommittee/yes/YEamend/gb_internet.htm

OTHER INFORMATION

(See interim directive id_1909.12-2008-2, FSH 1909.12, section 11.5)

Plans may include information other than the plan components, such as an explanatory narrative, general management principles, management approaches (defined in section 11.6), management challenges, referenced material, or roles and contributions. Other information must not be labeled or worded in a way that suggests it is a plan component. In addition, other information must not include, nor appear to include, a "to do" list of tasks or actions.

- 1. Priorities may be in your plan but are not, by themselves, plan components. It is recommended that they be placed under "management approaches." Ensure they do <u>not</u> read as plan components. (Note: In the objective section of this document, we have an example of objectives with priorities about the closure of one to two miles of unauthorized trails.)
- 2. Contractual wording to carry out plan direction for activities such as oil and gas leasing or timber sales should <u>not</u> be in the plan.
- 3. Do not include a list of any studies that are ongoing or planned.
- 4. It is not necessary to note repeatedly that one program area should consult with another program area when developing and carrying out projects.

Management Approaches

(See interim directive id_1909.12-2008-2, FSH 1909.12, section 11.6.)

This optional section of a plan, if included, should briefly describe the principal management approaches the responsible official is inclined to take during the plan period. The approaches should come from and respond to the desired conditions and the objectives. They may convey a sense of priority and focus among objectives so that the public will know the likely management emphasis. For a few important programs, management approaches may indicate the future course or direction of change, recognizing past trends of budget and program accomplishments, without making precise estimates of quantities. This section may also describe partnership opportunities and collaboration arrangements that support the achievement of desired conditions and objectives. Management approaches may discuss potential processes such as analysis,

⁴ This is incorporation by reference, all projects and activities must be consistent with the incorporated plan provisions.

assessment, inventory, or monitoring. This optional section must avoid making predictions or any statements that appear to be commitments or that may create unrealistic expectations among the public on the delivery of programs.

Other Referenced Information

Plans may include information other than the six components, such as management approaches or referenced material. This information may be interwoven in the plan if the information has a bold caption as shown below. Furthermore, this information may be provided in a separate section or in a separate appendix.

Examples of Other Referenced Information are below:

Example 1

Land Adjustment Management Approach

No quantifiable objectives are specified because proposals for land adjustment typically arise from external sources. The lands adjustment management approach will be to develop an adjustment plan separately from this land management plan as appropriate opportunities are presented. The Appalachian National Trail, land adjacent to the trail to provide better access to the trail, and land consolidation are three priorities for land acquisition.

Example 2

Other Referenced Guidance

More facility construction and design guidance is found in the Forest Service Built Environment Image Guide (USDA FS 2001).

Example 3

Other information to be considered for projects and activities

More information can be found in the Northern States Bald Eagle Recovery Plan (USFWS 1983).

What to include in the "Possible Actions" appendix

(See interim directive id_1909.12-2008-2, FSH 1909.12, section 11.3.)

- 1. This appendix should contain a brief summary of the types of actions, projects, or activities that may occur in the next 3 to 5 years to maintain or move toward the desired conditions (FSH 1909.12, section 11.3).
- 2. Program of work⁵ descriptions should not be placed in the plan.
- 3. This appendix shall explicitly state that the type of actions described are not commitments by the Agency to perform that work but are provided as a statement of "possible actions," including the planned timber sale program and the proportion of probable methods of timber harvest in the unit needed to fulfill the plan as provided in NFMA (16 U.S.C. 1604(f).

⁵ Program of work being a list of projects, activities and expected implementation dates.

Plan Consistency

See template wording at interim directive id_1909.12-2008-2, FSH 1909.12, section 11.2. The text in exhibit 01 of FSH 1909.12, section 11.2, Plan Consistency Template, must be included in a prominent location in the plan document. Recommended places are the beginning or in an appendix. This template will be updated as we learn. Please check the TIPS website.

Glossary

Do not interpret statutes in the glossary because of the likelihood of the statutes being interpreted incorrectly or incompletely. Citations or electronic links are appropriate, but please no definitions.

References and Citations

Specifically cite the source of references. When referencing applicable laws consult: http://fsweb.wo.fs.fed.us/la/reference/selectedlaws.pdf.

By using the caption "References" you may include unpublished works. It is recommended that you list entries alphabetically by author. Use the author-date method for citation references in the text. We recommend the Rocky Mountain Research Station guidance for preparing literature references. See Rocky Mountain Research Station's Guide for Citing Bibliographic References by Lillie E. Thomas at

http://www.fs.fed.us/rm/publications/authors_corner/biblio_references.pdf

For example:

U.S. Department of Agriculture, Forest Service. year. Record of Decision, Forest Plan Amendment-Your National Forest. 30 p.

Words that may be appropriate when used in standards but inappropriate for guidelines

The following words imply that a final agency action has been made rather than expressing an aspirational nature of a plan. Final agency actions are not appropriate in the plan components of desired conditions, objectives, guidelines generally suitable uses, and some special areas. They are potentially appropriate for standards, and in some special areas. To boil the following down, don't use words of command without a "should" to remove the imperative sense (except for standards).

Word	For Guidelines Try		
Avoid	Should avoid (The word "avoid" by itself is not appropriate. It conveys a prohibition rather than guideline,) See FSM 1110.8 for further discussion.		
Cannot	Should not (The word " <i>cannot</i> " is not appropriate. It conveys a prohibition rather than guideline or aspiration.)		
Commit	No substitutable word (Omit, the word " <i>commit</i> " does not convey that the plan component is aspirational.)		
Compel	No substitutable word		
Deny	Should		
Ensure	Should ensure		
Exclude	Should exclude		
Incompatible	No substitutable word.)		
Inconsistent	No substitutable word		
Limit	Should limit		
Must	Should		
Never	Should not (Omit, the word "never" is not appropriate because it conveys a prohibition rather than an aspiration or a guideline.)		
Only	No substitutable word (Omit, the word "only" is not appropriate because it conveys a prohibition rather than an aspiration or a guideline.		
Prevent	Should prevent or should avoid.		
Prohibit	Should avoid.		
Require	Omit		
Restrict	Should restrict or should avoid		
Shall	Should		

WHAT NOT TO INCLUDE IN THE PLAN

Direction regarding project level analysis

The plan should <u>not</u> discuss how to do project analysis – project analysis principles already exist in agency policy as codified in the Forest Service Directive System (directives).

Inventory and assessment tasks

The plan should <u>not</u> include a "to do" list for future inventory and assessment work. Such tasks may be tracked in a program of work, a business plan, or the budget process.

Direction to develop tactical management plans

The plan should <u>not</u> specify that tactical plans be developed (such as, habitat conservation plans, recovery plans, and conservation strategies).

Existing policy or direction

Plans should not include wording that merely repeats existing direction from directives, laws, or regulations as plan components, unless needed to deal with the "Plan provisions for resource management" requirements of Title 36, Code of Federal Regulations, section 219.12(b). A plan must include provisions required by Title 36, Code of Federal Regulations, 219.12(b). References to existing laws, regulations, or directives may be appropriate. Directives are at http://www.fs.fed.us/im/directives/.